

**KERN & HILLMAN, LLC**

SCOTT C. KERN  
ALLAN P. HILLMAN

[scott@franchiselawsource.com](mailto:scott@franchiselawsource.com)  
[allan@franchiselawsource.com](mailto:allan@franchiselawsource.com)



**Filed Electronically**

February 7, 2013

Honorable Catherine C. Blake  
United States Courthouse  
101 West Lombard Street  
Baltimore MD 21201

**Re: TECH USA, Inc. et al. v. Jason R. Beck et al. Civil Action no. CCB-12-3192**

Dear Judge Blake:

I am writing on behalf of the parties, with the kind concurrence of Defendants' counsel Mr. Schwartz. In accordance with counsels' communication with Chambers, I am filing a proposed Stipulation and Order Staying Case for Mediation and Deferring Modifications of Amended Scheduling Order.

We hope the Court will consider with favor our request for immediate mediation and deferral of the Scheduling Order. If it does not, however, Chambers suggested we advise the Court of any changes to the Scheduling Order we propose and answer the Court's questions in its letter of January 23, 2013.

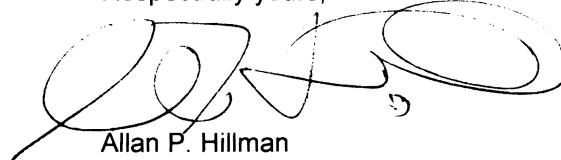
The parties have agreed on all these matters. As noted, we seek a settlement conference, now, at the outset. We see the need for ESI discovery. We do not consent to have the entire case proceed before a Magistrate. We seek thirty hours each for depositions.

We seek the following Amended Schedule, if the Court declines our request to refer the case now to a Magistrate for mediation.

<u>Present Date</u>	<u>Deadline</u>	<u>Proposed New Date</u>
February 6, 2013	Deadline for requests for modification of initial Scheduling Order	February 12, 2013
February 6, 2013	Joint request for early settlement/ADR conference (This request will not postpone discovery unless otherwise ordered.)	February 12, 2013
February 6, 2013	Report about deposition hours	February 12, 2013
February 6, 2013	Initial report whether there is unanimous consent to proceed before a United States Magistrate Judge	February 12, 2013

February 6, 2013	Deadline for conference about discovery of electronically stored information. (If either or both parties intend to take such discovery, before the conference counsel should review the Suggested Protocol for Discovery of Electronically Stored Information prepared by a Joint bench/bar committee published on the court's website.)	February 12, 2013
March 11, 2013	Moving for joinder of additional parties and amendment of pleadings	No Change
March 25, 2013	Plaintiff's Rule 26(a)(2) disclosures	April 5, 2013
April 23, 2013	Defendant's Rule 26(a)(2) disclosures	May 3, 2013
May 7, 2013	Plaintiff's rebuttal Rule 26(a)(2) disclosures	May 17, 2013
May 14, 2013	Rule 26(e)(2) supplementation of disclosures and responses	May 29, 2013
June 7, 2013	Discovery deadline; submission of status report	June 21, 2013
June 14, 2013	Requests for admission	June 28, 2013
July 8, 2013	Dispositive pretrial motions deadline	August 24, 2013

Respectfully yours,



Allan P. Hillman

Cc Kip Schwartz, Esquire (with enclosure, filed)  
Grover C. Outland, III, Esquire (with enclosure, filed)